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11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

14 JUAN CARLOS VERA,
15 Plaintiff,
16 v.

17 JAMES O'KEEFE III, an individual,
18 HANNAH GILES, an individual,
19 and DOES 1-20, inclusive,

20 Defendants.

21 Case No. CV 10-1422-L-MDD

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DEFENDANT JAMES O KEEFE III
FED. R. CIV. P. RULE 26(a)(3)
DISCLOSURES

Pre-Trial Conference

Date: July 23, 2012
Time: 11:00 a.m.
Judge: Hon. M. James Lorenz

1 Pursuant to the Court's December 14, 2011 Amended Case Management Order
2 Regulating Discovery and Other Pretrial Proceedings, Defendant James O'Keefe III ("O'Keefe")
3 hereby submits his Federal Rules of Civil Procedure Rule 26(a)(3) Pre-trial Disclosures to the
4 Honorable M. James Lorenz, in advance of the final Pretrial Conference on July 23, 2012 at 11:00
5 a.m.

6 **I. WITNESSES**

7 O'Keefe expects to call the following witnesses at trial:

8 Hannah Giles
9 c/o Benjamin Powell
10 WILMER CUTLER PICKERING HALE & DORR LLP
11 1875 Pennsylvania Avenue, NW
Washington, D.C. 20006

12 Alejandro Hernandez
13 c/o National City Police Department
1200 National City Boulevard
National City, CA 91950

14 Dr. Miguel Vera Islas
15 Laboratorio Clinico Alba
16 P. Ensenada # 1430-A Secc. Jardines, Playas de Tijuana
Tijuana, BC

17 James O'Keefe
18 c/o Michael Madigan
19 ORRICK, HERRINGTON & SUTCLIFFE LLP
1152 15th Street, NW
20 Washington, D.C. 20005

21 David Lagstein
22 4438 38th St.
San Diego, CA 92116

23 Amy Schur
24 1331 Westerly Terrace
25 Los Angeles CA 90026

26 Juan Carlos Vera
27 c/o Eugene Iredale, Esq.
Law Offices of Eugene G. Iredale
105 West "F" Street, 4th Floor
28 San Diego, CA 92101

1 **II. WITNESSES BY DEPOSITION**

2 O'Keefe expects to present the testimony of the following individual(s) through deposition:

3 Hannah Giles (if she does not appear at trial)
 4 c/o Benjamin Powell
 5 WILMER CUTLER PICKERING HALE & DORR LLP
 6 1875 Pennsylvania Avenue, NW
 7 Washington, D.C. 20006

8 **III. EXHIBITS**

9 Case Title: Juan Carlos Vera v. James O'Keefe III , et al Case No: CV 10-1422-L-MDD

10 **Defendant O'Keefe's List of Exhibits**

Exhibit	Date	Date	Description
No.	Marked	Admitted	
A			Defendant's unedited video recording of August 18, 2009 interaction with Vera at ACORN National City Office
B			Transcript (Parts I and II) of Defendant's unedited video recording of August 18, 2009 interaction with Vera at ACORN National City Office
C			Video of Defendant's interaction with Vera that was broadcast on Hannity Show (September 16, 2009)
D			Vera-ACORN September 18, 2009 Termination Memo
E			Plaintiff's Response to Defendant O'Keefe's Special Interrogatories (Set One) (Oct. 7, 2011).
F			Plaintiff's Response to Defendant Giles' Interrogatories (December 7, 2011) (Set One)
G			Plaintiff's Supplemental Response to Defendant Giles' Interrogatories (Set One) (Feb. 10, 2012).
H			Vera 2003 Federal Income Tax Return
I			Vera 2003 California State Income Tax Return
J			Vera 2005 Federal Income Tax Return
K			Vera 2005 California State Income Tax Return
L			Vera 2006 Federal Income Tax Return
M			Vera 2006 California State Income Tax Return
N			Vera 2007 Federal Income Tax Return
O			Vera 2007 California State Income Tax Return

1	P		Vera 2008 Federal Income Tax Return
2	Q		Vera 2008 California State Income Tax Return
3	R		Vera 2009 Federal Income Tax Return
4	S		Vera 2009 California State Income Tax Return
5	T		Vera 2010 Federal Income Tax Return
6	U		Vera 2011 California State Income Tax Return
7	V		Deposition transcript and video of Hannah Giles, and attached exhibits
8	W		Deposition video and transcript of David Lagstein, and attached exhibits
9	X		Deposition video and transcript of Juan Carlos Vera, and attached exhibits
10	Y		Schematic of inside the National City ACORN office in 2009
11	Z		ACORN statement terminating Juan Carlos Vera (Sept. 17, 2009)

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15 DATE: July 2, 2012MICHAEL J. MADIGAN
ORRICK, HERRINGTON & SUTCLIFFE LLP16
17 /s/ Michael J. Madigan
18 Michael J. Madigan
Attorney for Defendant19
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